

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

ALFA LIFE INSURANCE CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. CV-05-775-MHT
)	
ADVANTAGE CONSULTING GROUP, INC.)	
and RICHARD E. KNUTSON,)	
)	
Defendants.)	
<hr/>		
ADVANTAGE CONSULTING GROUP, INC.,)	
)	
Third-party Plaintiff(s),)	
)	
v.)	
)	
EDS SOLCORP,)	
)	
Third-party Defendant(s).)	

JOINT PROPOSED SCHEDULING ORDER

COME NOW, all parties to the above-styled case and respectfully move the Court to extend the trial date and the other deadlines previously entered by the Court as reflected in the Scheduling Order in this matter. The parties respectfully propose the following deadlines:

1. That a pretrial conference of this case be scheduled during July 2007. The parties expect that the case should be ready for trial and be set for trial on the Court's first docket following October 1, 2007. The parties expect, at this time, that the trial should take approximately 7-8 days.

2. Any dispositive motions, i.e., motions to dismiss or motions for summary judgment, should be filed no later than May 31, 2007.

3. That on or before October 31, 2006, counsel for all parties shall conduct a face-to-face settlement conference.

4. All discovery shall be completed on or before July 1, 2007. That any parties plaintiff shall identify and provide the reports of retained experts or witnesses whose duties as an employee of the party regularly involved giving expert testimony, on or before January 31, 2007. Any parties plaintiff are to make such experts available for deposition on or before February 28, 2007.

5. That Defendants shall identify and provide the reports of retained experts or witnesses whose duties as an employee of the party regularly involve giving expert testimony on or before March 31, 2007. Defendants are to make such experts available for deposition on or before April 30, 2007.

6. Final lists of witnesses and exhibits are to be exchanged pursuant to the terms of the Court's pretrial order. Parties shall have fourteen (14) days after service of the final lists of witnesses and exhibits to list objections.

Submitted this 28th day of August, 2006.

Respectfully submitted,

s/William P. Gray, Jr.

WILLIAM P. GRAY, JR.

DOUGLAS N. ROBERTSON

Attorneys for Plaintiff

ALFA INSURANCE CORPORATION

OF COUNSEL:

GRAY & ASSOCIATES, L.L.C.

3800 Colonnade Parkway, Suite 545

Birmingham, Alabama 35243

s/J. Forrest Hinton

J. FORREST HINTON

W. PATTON HAGN

JAMES F. BARGER, JR.

Attorneys for Defendant/Third-party Plaintiff

ADVANTAGE CONSULTING GROUP, INC. AND

DEFENDANT RICHARD E. KNUTSON

OF COUNSEL:

BAKER, DONELSON, BEARMAN,

CALDWELL & BERKOWITZ, P.C.

420 North 20th Street, Suite 1600

Birmingham, Alabama 35203

s/Geoffrey S. Bald

JOHN C. MORROW

GEOFFREY S. BALD

Attorneys for Third-party Defendant

EDS SOLCORP

OF COUNSEL:

BURR & FORMAN LLP

420 North 20th Street, Suite 3100

Birmingham, Alabama 35203

Telephone: (205) 251-3000

Facsimile: (205) 458-5100